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Email: ijsaacs@ifcounsel.com 1 2 3 4 5 Email: jisaacs@ifcounsel.com 6 Attorneys for Plaintiffs Judith Allen, et al. 7 (Continued on Next Page) 8 9 UNITED STATES DISTRICT COURT 10 CENTRALDISTRICT OF CALIFORNIA 11 JUDITH ALLEN, et al., Case No.: 14-CV-02721-MWF-FFM 12 Plaintiffs, 13 VS. 14 JOINT STIPULATION FOR GIRARDI KEESE, et al., DISMISSAL OF ENTIRE ACTION WITH PREJUDICE PURSUANT TO 15 Defendants. FRCP RULE 41(a)(1)(A)(ii)16 Assigned to Hon. Michael W. Fitzgerald 17 Room 1600 18 19 20 21 22 Complaint Filed: April 9, 2014 23 FAC Filed: January 23, 2015 OSC re Dismissal: August 29, 2016 24 25 26 27 28 JOINT STIPULATION FOR DISMISSAL OF ENTIRE ACTION WITH PREJUDICE

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1 (Continued from Previous Page) 2 Attorneys for Defendants 3 Thomas V. Girardi, State Bar No. 36603 4 James G. O'Callahan, State Bar No. 126975 5 **GIRARDI I KEESE** 6 1126 Wilshire Boulevard Los Angeles, California 90017 Telephone: (213) 977-0211 Facsimile: (213) 481-1554 8 Email: jgocallahan@girardikeese.com 9 10 Robert C. Baker, State Bar No. 49255 Phillip A. Baker, State Bar No. 169571 11 BAKER, KEENER & NAHRA LLP 12 633 W. Fifth Street, Suite 4900 Los Angeles, CA 90071 13 Telephone: (213) 241-0900 14 Facsimile: (213) 241-0990 Email: pbaker@bknlawyers.com 15 16 17 18 19 20 21 22 23 24 25 26 27 28 JOINT STIPULATION FOR DISMISSAL OF ENTIRE ACTION WITH PREJUDICE

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1 This Stipulation is entered into between the parties to this matter by and through 2 their respective counsel of record. 3 WHEREAS, Plaintiffs and Defendants Thomas V. Girardi, James G. 4 O'Callahan and Girardi | Keese (collectively, "Defendants") have entered into a 5 Settlement Agreement. 6 WHEREAS, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), 7 following the filing of an answer by a defendant, a plaintiff may dismiss his or her 8 claims without a court order if all parties appearing in the lawsuit so stipulate. 9 NOW, THEREFORE, the parties, through their respective counsel of record, 10 hereby stipulate and agree as follows: 11 That the entire action by Plaintiffs against Defendants shall be 1. 12 dismissedwith prejudice; and 13 2. That each party shall be responsible for their own fees and costs. 14 15 IT IS SO STIPULATED: 16 17 Dated: July25, 2016 ISAACS | FRIEDBERG LLP 18 19 FREY B. ISAACS, ESO. 20 Attorneys for Plaintiffs Judith Allen, et al. 21 22 Dated: July 25, 2016 BAKER, KEENER & NAHRA LLP 23 24 PHILLIP A. BAKER, Esq. 25 Attorneys for Defendants Girardi Keese, et al. 26 27 28

## **PROOF OF SERVICE**

## STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles. I am over the age of 18 and not a party to the within action; my business address is: Isaacs | Friedberg LLP, 555 South Flower Street, Suite 4250, Los Angeles, California 90071.

On July 25, 2016, I served a copy of the following document(s) described as

## JOINT STIPULATION FOR DISMISSAL OF ENTIRE ACTION WITH PREJUDICE PURSUANT TO FRCP RULE 41(a)(1)(A)(ii)

on the interested party(ies) in this action as follows:

- [X] BY MAIL: By placing a true copy thereof enclosed in a sealed envelope(s) addressed as above and placing each for collection and mailing on that date following ordinary business practices. I am "readily familiar" with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service in Los Angeles, California, in a sealed envelope with postage fully prepaid.
- [] BY MESSENGER SERVICE: I served the documents by placing them in an envelope or package addressed to the persons listed below and providing them to a professional messenger service for service.
  - BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- [X] STATE: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on July 25, 2016, at Los Angeles, California.

Lynn Leiro

П

**SERVICE LIST** JAMES G. O'CALLAHAN JORDAN E. SCOTT GIRARDI | KEESE 1126 Wilshire Boulevard Los Angeles, CA 90017 jgocallahan@girardikeese.com jscott@girardikeese.com Attorneys for Defendants ROBERT C. BAKER PHILLIP A. BAKER BAKER, KEENER & NAHRA LLP 633 W. Fifth Street, 55<sup>th</sup> Floor Los Angeles, CA 90071 pbaker@bknlawyers.com rbaker@bknlawyers.com **Attorneys for Defendants SERVICE LIST**